

EMAIL CHAIN OCTOBER 18 and 19, 2017

Good Afternoon Counsel,

Thank you so much for letting us know. I'm cc Maryellen in this email as well.

We will hold the motions in accordance with LR (14 days) before bringing it to chambers for ruling along with any supporting documents and/or additional pleadings filed.

Clary Geraldino-Karasek , Docket Clerk
To Chief Judge Patti B. Saris
U.S District Court, District of Massachusetts
617-748-9178

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From: "rgoren@richardgorenlaw.com" <rgoren@richardgorenlaw.com>
To: "Jay M. Wolman" <jmw@randazza.com>, "maryellen_molloy@mad.uscourts.gov" <maryellen_molloy@mad.uscourts.gov>, "[Clarilde Geraldino-Karasek@mad.uscourts.gov](mailto:Clarilde_Geraldino-Karasek@mad.uscourts.gov)" <[Clarilde Geraldino-Karasek@mad.uscourts.gov](mailto:Clarilde_Geraldino-Karasek@mad.uscourts.gov)>
Cc: Marc Randazza <mjr@randazza.com>
Date: 10/19/2017 01:16 PM
Subject: Re: Activity in Case 1:17-cv-10356-PBS Monsarrat v. GOTPER6067-00001 et al Errata

Jay,
Does it not make sense to coordinate the briefing on this motion with plaintiff's motion to amend.

I propose we coordinate the briefing, including any replies, on the two motions and to most efficiently use the Court's time and resources request a single hearing.

I contemplate bringing to the hearing, the two Exhibits, C and D, to the proposed amended complaint that are the subject of the motion to seal.

I copy Ms. Molloy and Ms. Geraldino-Karasek solely because you did so.

I do not believe it helpful to bother Ms. Molloy and Ms. Geraldino-Karasek with counsel's scheduling efforts and would suggest this be the last of such communications.

Thanks to all.

Richard

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From: "Jay M. Wolman" <jmw@randazza.com>
Date: Wednesday, October 18, 2017 at 4:46 PM
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Randazza <mjr@randazza.com>, Staff Two <tar@randazza.com>
Subject: Fwd: Activity in Case 1:17-cv-10356-PBS Monsarrat v.
GOTPER6067-00001 et al Errata

Dear Ms. Molloy & Ms. Geraldino-Karasek,

I am counsel for Defendant Brian Zaiger in the above-referenced matter. I am writing in furtherance of my conversation with Ms. Molloy. Although under Local Rule 7.1(b)(2) we would ordinarily have 14 days to respond to the motion to seal (Dkt. No. 45), it is our experience that motions to seal are often adjudicated rapidly. Thus, we wish to inform the Court that we intend to file an opposition to the motion to seal (Dkt No. 45). There is no exigency as Plaintiff has not filed the materials sought to be sealed on the public docket.

Thank you for your attention to this matter.

Sincerely,
Jay Wolman

Jay Marshall Wolman, CIPP/US, Counsel*
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